

Adam Dickens

In THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

C.M. COLLINS, N.J. LUNDY, §
and R.C.L. MAYS, §
Individually and on behalf §
of all other similarly §
situated, §

Plaintiffs, §

VS. §

NO. 4:22-cv-1073

CATASTROPHE RESPONSE UNIT, §
INC. and CATASTROPHE §
RESPONSE UNIT USA, INC., §

Defendants. §

ORAL DEPOSITION OF
ADAM DICKENS
NOVEMBER 1, 2023
VOLUME 1

Adam Dickens

2

1 ORAL DEPOSITION of ADAM DICKENS,
2 produced as a witness at the instance of the
3 Plaintiffs, and duly sworn, was taken in the
4 above-styled and numbered cause on the 1st of
5 November, 2023, from 9:58 a.m. to 1:54 p.m., before
6 Kathy E. Weldon, CSR in and for the State of Texas,
7 reported by machine shorthand, at the offices of
8 Hallett & Perrin, 1445 Ross Avenue, Suite 2400, in the
9 City of Dallas, County of Dallas, State of Texas,
10 pursuant to Notice and the Federal Rules of Civil
11 Procedure.

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Southwest Reporting & Video Services, Inc. Registration #189
 713-650-1800 swreptproduction@swreporting.com

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1 A. So desk adjusters, we face a penalty for not 44
 2 providing -- I'm just trying to think of the best way
 3 to phrase it for you -- not fulfilling the client's
 4 ask within certain timelines.
 5 Q. Okay. And the client being TD?
 6 A. Correct.
 7 Q. Is there a particular person at TD that's
 8 designated as the person that identifies what a
 9 particular deadline's going to be?
 10 A. No. It's in the contract.
 11 Q. Okay. So these deadlines for the desk
 12 adjuster work are specifically within the contract?
 13 A. Correct.
 14 Q. Okay. And are those -- are those dead- --
 15 those deadlines based on closing a percentage of
 16 claims within a certain period of time as well?
 17 A. No.
 18 Q. Okay. How is it -- how is that defined
 19 within the contract?
 20 A. So you -- sorry, you're thinking at it from
 21 the wrong angle. So it's the field one is a back-end
 22 closed. The desk one is actually front-end adjusters
 23 in the door. So in the contract, we have timelines to
 24 provide adjusters to TD.
 25 Q. Okay. So the timeline, there are specific

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1 A. The -- the more overdue activities there are 49
 2 on adjusters' files, then there's the potential for a
 3 reduction.
 4 Q. Okay. How much -- how -- how much of a
 5 maximum reduction can occur on an overdue file?
 6 What's the maximum reduction amount?
 7 A. It's not a file amount.
 8 Q. Okay.
 9 A. It's a -- it's a billing percentage for the
 10 indivi- -- for the individual. And, Kerry, I don't
 11 remember the amount off the top of my head.
 12 Q. That's fine.
 13 A. Yeah.
 14 Q. Okay. So it's my understanding, then, that
 15 if the desk adjusters don't complete certain
 16 activities on their files, it can result in CRU being
 17 paid less money for that work?
 18 A. Correct.
 19 MS. LASTER: Kerry, when you get a
 20 moment, can we do a --
 21 MR. O'BRIEN: Break? That's fine.
 22 MS. LASTER: Thank you.
 23 MR. O'BRIEN: Go off the record.
 24 (Break from 10:54 a.m. to 11:11 a.m.)
 25 Q. (By Mr. O'Brien) Mr. Dickens, are you

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53

1 **contract.**

2 Q. And what's "it"?

3 **A. I would have to read the contract. I don't**

4 **know off the top of my head.**

5 Q. You said "stay" -- "if it stayed below the

6 percentage."

7 **A. The number of overdue activities.**

8 Q. Got it. So there's a threshold that -- that

9 has to be crossed before the penalty applies?

10 **A. Correct.**

11 Q. Okay. Now, on the TD account, is it your

12 understanding that TD -- TD uses an application called

13 Guidewire for their claims tracking?

14 **A. Yes.**

15 Q. Has that been the case since you've come on

16 board? Has Guidewire been the -- their application

17 of -- of choice since you came on board?

18 **A. Yes.**

19 Q. Do you know who -- who licenses that software

20 for this use, is it CRU or TD?

21 **A. TD.**

22 Q. What -- what application -- first of all, let

23 me ask you: When did you manage the BAU claims on the

24 Gore account?

25 **A. Sorry?**

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55

1 Are any desk adjusters -- and I'm

2 asking -- you know, obviously, I've -- I guess I'm

3 asking as of this moment, but --

4 **A. Yeah.**

5 Q. -- I can always change that.

6 But currently, are any desk adjusters

7 assigned to the TD account permitted to use their

8 personal laptops to perform their adjusting work for

9 TD?

10 **A. No.**

11 Q. And why not?

12 **A. That's the request of the client.**

13 Q. So each desk adjuster that is assigned to the

14 TD account is provided a laptop, correct?

15 **A. Correct.**

16 Q. Who prepares that laptop?

17 **A. TD.**

18 Q. So is -- is CRU just a conduit for that --

19 for that laptop?

20 MS. LASTER: Objection, form.

21 Q. (By Mr. O'Brien) Let me ask you this: Does

22 CRU make any modifications to that laptop before

23 sending it to the desk adjuster?

24 **A. CRU doesn't touch that laptop.**

25 Q. Okay. So it's -- so the laptop goes directly

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Adam Dickens

61

1 Q. Possibly all of them, correct?

2 MS. LASTER: Objection, form.

3 **A. No.**

4 Q. (By Mr. O'Brien) Okay. So some are working

5 from a home office, some may be -- you said possibly.

6 You don't know for certain, but some may actually rent

7 an office that they may go to, correct?

8 **A. Correct.**

9 Q. What other locations are current TD desk

10 adjusters working from, to your knowledge?

11 **A. To my knowledge, none.**

12 Q. To your knowledge -- oh, none others -- no

13 other settings, no other -- okay.

14 And so there's no -- there's no rented

15 office -- an office rented by CRU to -- or TD, to your

16 knowledge, to which some of the desk adjusters have to

17 report on a daily basis?

18 MS. LASTER: Objection, form.

19 **A. Sorry, Kerry, can you repeat that, please?**

20 Q. (By Mr. O'Brien) Sure.

21 Do any -- do any of the adjusters -- any

22 of the desk adjusters on the TD account have to report

23 to an office that's paid for or sponsored by CRU or

24 TD, to your knowledge?

25 **A. No.**

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65

1 Q. Well, within BAU are -- well, let me ask you

2 this: Within BAU, are the adjusters typically

3 handling a subset of a certain type of claims within

4 BAU, or are they assigned to whatever claim comes in?

5 **A. They would handle either property or -- if**

6 **they're auto adjusters, they would handle auto.**

7 Q. Okay. So within BAU, they're still going to

8 be assigned to one type of claim or another; is that

9 correct?

10 **A. Correct.**

11 Q. So between BAU, auto, and cat auto, is there

12 typically a difference in average volume?

13 **A. I don't know.**

14 Q. Let me talk about on-boarding of -- of desk

15 adjusters to the TD account. Is there any training

16 that takes place for that?

17 **A. Yes.**

18 Q. Okay. Can you tell me -- have you

19 actually -- is -- let me stop for a second.

20 Is the training done -- it's done by --

21 over the Internet, correct?

22 **A. Correct.**

23 Q. Is it typically live training? Is it all

24 live training, or is it all prerecorded or otherwise?

25 **A. A -- the vast majority is live versus**

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73

1 just mentioned about, sort of a change in compensation
2 methods.

3 So are all current desk adjusters at CRU
4 that are on the TD account -- are they being paid on a
5 W-2 basis at this time?

6 **A. No.**

7 MS. LASTER: Objection, form.

8 Q. (By Mr. O'Brien) Some of them are; is that
9 correct?

10 **A. Yes.**

11 MS. LASTER: Objection.

12 Q. (By Mr. O'Brien) Okay. So what criteria is
13 used to determine whether or not a particular desk
14 adjuster is going to be paid on a 1099 or a W-2 basis?

15 MS. LASTER: Objection, form.

16 **A. There's none paid on 1099.**

17 Q. (By Mr. O'Brien) Okay. So -- okay. So the
18 current desk adjusters on the TD account, are they --
19 and I think I just asked this. I want to be clear --
20 are they all being currently -- currently being paid
21 on W-2 basis?

22 MS. LASTER: Objection to form.

23 **A. No.**

24 Q. (By Mr. O'Brien) Okay. So if they're not
25 being -- the ones who are not being paid on a W-2

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74

1 basis, how are they being paid?

2 **A. They're being paid as contractors.**

3 Q. Okay. So some of them are being paid as a
4 contractor still, correct?

5 **A. Correct.**

6 Q. Okay. And that's when I -- when I say 10- --
7 I'm -- that's probably the issue.

8 Do you know what a 1099 is?

9 **A. Yes.**

10 Q. Okay. So do you -- do you equate contractor
11 with 1099? Do those mean the same thing to you?

12 MS. LASTER: Objection, form.

13 **A. Yes.**

14 Q. (By Mr. O'Brien) Okay. Because I think I
15 just asked you a moment ago whether any are still
16 being paid on a 1099 basis, and you said --

17 **A. No.**

18 Q. Okay. So -- so are there desk adjusters
19 being paid as independent contractors currently on the
20 TD account?

21 **A. Yes.**

22 Q. Okay. And will they be -- will CRU be
23 issuing them a form 1099 at the end of the year?

24 **A. No.**

25 Q. Okay. So is it because they're -- because

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75

1 they work in Canada?

2 **A. Correct.**

3 Q. Thank you. Got it.

4 So can you please tell me about the --
5 the compensation structure of the desk adjusters
6 working on the W-2 basis now?

7 MS. LASTER: Objection, form.

8 **A. They're paid on an hourly basis.**

9 Q. (By Mr. O'Brien) Okay. So they're paid a
10 certain hourly rate for each hour that they work,
11 correct?

12 **A. Correct.**

13 Q. And if they go over 40 hours in a workweek,
14 are they paid an overtime premium?

15 **A. Correct.**

16 Q. And I assume that all these W-2 desk
17 adjusters are ones who are performing their work from
18 the United States?

19 **A. Correct.**

20 Q. Is there any other incentive compensation --
21 is there any incentive compensation component as part
22 of this W-2 structure?

23 **A. Not that I'm aware of.**

24 Q. So their pay structure, basically just --
25 it's a straight hourly rate unless they go over 40

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87

1 **A. No.**

2 Q. What was your understanding of the purpose of
3 that tracker spreadsheet?

4 **A. To track the activity by the adjusters on the
5 files to provide information to the client.**

6 Q. Okay. Is it your understanding that while
7 they were using this tracker spreadsheet, that they
8 would have been inputting claims information into
9 Guidewire as well?

10 **A. Yes.**

11 Q. Okay. And do you -- is it your understanding
12 that some of the information that they put on the
13 tracker spreadsheet duplicated the information that
14 they had already put into Guidewire -- Guidewire on
15 particular claims' activity?

16 **A. No.**

17 Q. So none of it was duplicated?

18 **A. Yeah, I don't think your question captures
19 it. I'm not being rude.**

20 Q. You're Canadian. Of course, you're not.

21 **A. The -- it was just what the singular action
22 was on the -- on the spreadsheet, a check in a check
23 box.**

24 Q. And what information was being given to TD
25 from the tracker spreadsheet?

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90

1 during a week, correct?

2 MS. LASTER: Objection, form.

3 **A. Correct.**

4 Q. (By Mr. O'Brien) Okay. And if CRU adjusters
5 did not meet those requirements, could that implicate
6 potential penalties against CRU under the TD contract?

7 **A. Potentially.**

8 Q. Okay. And so are you aware of the managers
9 or leads doing anything to try to encourage, motivate,
10 or otherwise discipline the desk adjusters to -- let
11 me strike that.

12 Are you aware of any- -- anything that
13 the team leads or the managers did to try to get the
14 desk adjusters to meet the client's requirements in
15 that respect?

16 **A. Yes.**

17 Q. What?

18 **A. There would be coaching about setting your**
19 **activities and not overloading one day of your week**
20 **versus another day of your week so that it wouldn't**
21 **all pile down on one -- on one week.**

22 Q. Okay. Anything else?

23 **A. No.**

24 Q. Okay. Were the desk adjusters required to
25 touch a certain number of claims in each week?

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91

1 MS. LASTER: Objection, form.

2 **A. Expected to.**

3 Q. (By Mr. O'Brien) Expected to?

4 And if a particular desk adjuster
5 consistently failed to meet those expectations, that
6 desk adjuster could be released by CRU, correct?

7 **A. Correct.**

8 Q. And -- and I'm not sure if this was clear
9 from the last -- from my prior question on this. Were
10 you aware of the mana- -- have you been aware of the
11 managers and team leads requiring that each desk
12 adjuster conduct a certain amount of claim activities
13 on each particular workday?

14 **A. No.**

15 Q. So what you understand or what you're aware
16 of is requirements based on a weekly basis, correct?

17 **A. Correct.**

18 Q. Would the managers or desk adjusters have had
19 the authority to require -- wait a second. Strike
20 that.

21 Would the managers of the team leads have
22 had the authority to require the desk adjusters to
23 perform a certain quantity of claims activity every
24 day as part of their management of those adjusters?

25 MS. LASTER: Objection, form.

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92

1 **A. So repeat that, please.**

2 Q. (By Mr. O'Brien) Sure.

3 Did the -- did the -- did the team leads
4 or the manager have the authority to require the desk
5 adjusters that they managed to perform a certain
6 amount of claims activity per day?

7 MS. LASTER: Objection, form.

8 **A. Yes.**

9 Q. (By Mr. O'Brien) But you don't know whether
10 or not they've -- they've done that in the past, I
11 guess, since you've come on board? You don't know
12 whether or not that's actually occurred with managers
13 of team leads since you've come on board on the TD
14 account, correct?

15 **A. There's still the expectation of the client.**

16 Q. Sure.

17 But what -- is there an expectation of
18 the client as far as daily progress or daily activity
19 of their desk adjusters?

20 **A. No.**

21 Q. You had mentioned one of the penalty
22 provisions had to do with field adjusters, I believe,
23 bringing claims to close within 28 days. Was that
24 correct?

25 **A. Not really.**

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94

1 **A. No.**

2 Q. They're not saved, or you don't know?

3 **A. I don't know. That was your question.**

4 Q. Okay. Fair enough. Yeah, absolutely.

5 Do you know who had access to the tracker
6 spreadsheets that you referenced earlier?

7 MS. LASTER: Objection, form.

8 **A. Adjusters, team leads, and the managers.**

9 Q. (By Mr. O'Brien) Is it your understanding
10 that the -- that all of the adjusters on the team
11 would use the same tracker spreadsheet?

12 **A. Yes.**

13 Q. So basically, the data input by each adjuster
14 on the team would be seen -- could be seen by all the
15 other adjusters on the team?

16 **A. Yes.**

17 Q. Does TD -- under the contract -- the current
18 contract with TD, do they have any requirements as far
19 as when they need adjusters to be available to field
20 communications from their insured?

21 **A. No.**

22 Q. Do they -- so do they have any coverage
23 requirements as far as -- I guess to phrase it
24 differently, does TD require adjusters to be available
25 or performing work during any particular part of the

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95

1 day?

2 **A. Yes.**

3 Q. And what is that?

4 **A. The workday.**

5 Q. Okay. And when you say "the workday," what

6 do you mean?

7 **A. Generally, it's 8:00 to 5:00, 6:00 local**

8 **time.**

9 Q. I'm sure that time may differ depending on

10 what -- in what time zone the adjuster's located,

11 correct?

12 **A. No.**

13 Q. No?

14 Okay. So typically, they're going to be

15 from 8:00 a.m. to 5:00 or 6:00 in whatever time zone

16 they're in?

17 **A. No.**

18 Q. Okay. So what -- so that's your -- but you

19 describe that as the workday, correct?

20 **A. Correct.**

21 Q. Okay. And that -- would that be Monday

22 through Saturday?

23 **A. Yes.**

24 Q. So as part of being on the TD account, a desk

25 adjuster is going to have to keep hours similar to

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Adam Dickens

96

1 this in order to meet TD's expectations, correct?

2 **A. Correct.**

3 Q. Are there any desk adjusters on the TD

4 account that you're aware of that do not -- are not

5 required to keep any specific hours?

6 **A. Not that I'm aware of.**

7 Q. So if an -- a desk adjuster -- if -- if a

8 desk adjuster is not keeping up with the deadlines

9 expected of TD, CRU can release that adjuster,

10 correct?

11 **A. Correct.**

12 Q. And now that adjusters are being paid on a

13 W-2 basis, is it fair to say that CRU can fire the

14 adjuster?

15 **A. Yeah. They would still be released, yeah.**

16 Q. Okay. But would -- is -- is it inaccurate to

17 say that they're being fired?

18 **A. Well, it's the end of their employ- --**

19 **employment.**

20 Q. Okay. So is it inaccurate from me to say

21 that they are being fired?

22 **A. If you need to use that word, you can.**

23 Q. But it's not. I mean, they are being --

24 they're losing -- they're being terminated from a

25 position --

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Adam Dickens

102

1 Q. Anything else?

2 **A. No.**

3 Q. Would you have those types of meetings

4 initially when they're on-boarding as part of training

5 them up to TD's expectations?

6 **A. You know, we talked about that earlier, that**

7 **we'd talk about what the expectations are, same type**

8 **of thing.**

9 Q. Okay. And any other reason you would have

10 these types of group meetings other than what you've

11 mentioned so far?

12 **A. Essentially, talk about -- yeah, yeah.**

13 Q. What reasons?

14 **A. Potentially talk about the -- how the**

15 **deployment was doing.**

16 Q. Anything else?

17 **A. No.**

18 Q. Now, prior to CRU paying desk adjusters --

19 well, first of all, let me ask you: Is it your

20 understanding that all desk adjusters working in the

21 United States --

22 (Interruption.)

23 MR. O'BRIEN: For a second there, I was

24 hoping she'd take over the deposition for me.

25 Q. (By Mr. O'Brien) Okay. Prior to CRU paying

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103

1 desk adjusters in the United States on a W-2 employee

2 basis, was it your understanding that the -- those

3 same adjust- -- those same adjusters were being paid

4 on a 1099 contractor basis?

5 **A. Yes.**

6 Q. And is it your understanding they were all

7 being paid on a day-rate basis?

8 **A. On the TD account?**

9 Q. Only -- that's a good question.

10 Yes, on the TD account.

11 **A. Yes.**

12 Q. Okay. Actually, this was the question I was

13 going to ask before. Are you aware of whether or not

14 all desk adjusters employed by CRU, regardless of the

15 contract, that work in the United States are currently

16 being paid on a W-2 basis?

17 **A. I don't have any knowledge of that.**

18 Q. And so going back to when they're desk

19 adjusters, say, on the TD account were being paid on a

20 1099 basis, they're paid on a day rate, correct?

21 **A. Correct.**

22 Q. And a day rate being a set amount of money

23 regardless of the time work -- work spent -- time

24 spent working that day, correct?

25 MS. LASTER: Objection, form.

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105

1 Q. So once they miss four and a half hours,
2 they've missed half of a workday?

3 A. Yeah. It's not written in stone, but yes.

4 Q. Who makes the decision as to whether or not a
5 particular adjuster has worked only half of a workday?

6 A. That would be the managers.

7 Q. You said it's not written in stone, meaning
8 that the manager can use their discretion as to
9 whether or not they think that the adjuster has only
10 worked half a day?

11 A. No. Because that's reported by the adjuster.

12 Q. Oh, that they worked half a day?

13 A. Yeah.

14 MR. HURST: That was totally my fault. I
15 hit the wrong button.

16 Q. (By Mr. O'Brien) Do you have any knowledge as
17 to why CRU is paying desk adjuster on a W-2 basis now?

18 A. Yes.

19 Q. What is that knowledge?

20 A. This lawsuit.

21 Q. Have you spoken to Faye Quinnie at any time
22 in the last month?

23 A. Yes.

24 Q. Okay. Have you spoken to her for any reason
25 related to this lawsuit?

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134


1 STATE OF TEXAS)

2 COUNTY OF DALLAS)

3 I, Kathy E. Weldon, Certified Shorthand
4 Reporter, in and for the State of Texas, certify that
5 the foregoing deposition of ADAM DICKENS was reported
6 stenographically by me at the time and place
7 indicated, said witness having been placed under oath
8 by me, and that the deposition is a true record of the
9 testimony given by the witness.

10 I further certify that I am neither counsel
11 for nor related to any party in this cause and am not
12 financially interested in its outcome.

13 Given under my hand on this the ____ day of
14 _____, 2023.



16 Kathy E. Weldon
17 Shorthand Reporter No. 6166
18 My commission expires 10-31-25

19 Time used by each party:
20 Mr. Kerry V. O'Brien - 2:32
21 Ms. Kristen A. Laster - 0:03
22 Mr. Monte K. Hurst - 0:00
23
24
25

Adam Dickens

134

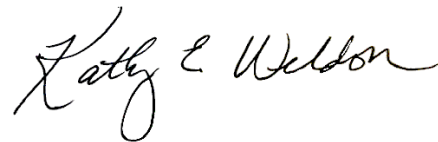
1 STATE OF TEXAS)

2 COUNTY OF DALLAS)

3 I, Kathy E. Weldon, Certified Shorthand
4 Reporter, in and for the State of Texas, certify that
5 the foregoing deposition of ADAM DICKENS was reported
6 stenographically by me at the time and place
7 indicated, said witness having been placed under oath
8 by me, and that the deposition is a true record of the
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16
17 Kathy E. Weldon
18 Shorthand Reporter No. 6166
My commission expires 10-31-25

19 Time used by each party:
20 Mr. Kerry V. O'Brien - 2:32
21 Ms. Kristen A. Laster - 0:03
22 Mr. Monte K. Hurst - 0:00
23
24
25